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May 16, 2013

Chris Jones
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Jones:

This letter is submitted by the undersigned counsel on behalf of Freedom Born, Inc. (FEC ID C90013699) in response to your later dated April 15, 2013, referencing Freedom Born's Year-End Report. Freedom Born's report is in compliance with Federal Election Commission regulations and no amendments are required.

Your request asserts that "[e]ach contributor who made a donation in excess of \$200 used to further the independent expenditure(s) must be itemized on Schedule 5-A" and refers to 11 CFR 109.10(e)(1)(vi) and 114.10(f). The cited regulations state, in pertinent part, that the report must include "[t]he identification of each person who made a contribution in excess of \$200 to the person filing such report, which contribution was made for the purpose of furthering the reported independent expenditure" (emphasis added). 11 C.F.R. 109.10(e)(1)(vi). We note that the regulation requires reporting of contributions stemming from the intent of the donor, not the ultimate use of the contribution by the recipient.

Freedom Born has not received any contributions for the purpose of furthering the reported independent expenditures and does not solicit contributions for any such purpose. Furthermore, Freedom Born is not a Qualified Nonprofit Corporation; therefore, 11 C.F.R. 114.10(f) is inapplicable. Accordingly, the regulations cited do not require Freedom Born to disclose any contributors and no amendment to the referenced report is required.

Freedom Born is aware of the reporting obligations under 11 CFR 109.10. If, in the future, Freedom Born receives a contribution for the purpose of furthering an independent expenditure, then it will be properly reported to the Federal Election Commission on Form 5.

Sincerely,

Chris K. Gober
